from the state, and, as has been shown above, one act may offend both state and nation.

DOMICILE — HUSBAND AND WIFE: POSSIBILITY OF SEPARATE DOMICILE — Parties who were married in 1878 and resided in Scotland, parted by consent in 1893, the husband going to Australia and never returning to Scotland. The wife never went to Australia. In 1902, the husband went through the form of a bigamous marriage. In 1915, suit for divorce was brought by the wife in Scotland. While the suit was pending, she died. In order to determine the validity of the imposition of a tax, it was necessary to decide where the wife was domiciled. *Held*, that she was domiciled in Australia. *Lord Advocate* v. *Jaffrey*, [1921] 1 A. C. 146.

The proposition that the domicile of a married woman is that of her husband, though by no means universally approved, has hitherto been generally conceded to be a correct statement of the law. See Joseph H. Beale, "The Domicile of a Married Woman," 2 SOUTH. L. QUART. 93, 95. But recently in America, and even aside from the controversial question of domicile for purposes of divorce proceedings, courts have not been averse to qualifying, if not abandoning, the doctrine. There is some little authority to the effect that, once having acquired grounds for divorce, and the obligation to live with the husband having ended, the wife may acquire a separate domicile for any purpose. *Williamson* v. *Osenton*, 232 U. S. 619; *Shute* v. *Sargent*, 67 N. H. 305, 36 Atl. 282. And there are sporadic decisions to the effect that a voluntary separation for an extended period enables the wife to acquire a separate domicile. *Matter of Florance*, 54 Hun, 328, 7 N. Y. Supp. 578, appeal dismissed 119 N. Y. 661, 23 N. E. 1151. See *Buchholz* v. *Buchholz*, 63 Wash. 213, 115 Pac. 88. See also 28 HARV. L. REV. 196. When it is considered that in the principal case we have (1) an agreement to separate, (2) a separation for twenty-two years, and (3) undoubted cause for divorce, this House of Lords decision must be deemed a decisive and unequivocal adherence to the general rule as to the domicile of a wife, and indicates a disinclination to depart from that rule under any circumstances.

EQUITABLE SERVITUDES — INJUNCTIONS — VIOLATION OF MUTUAL BUILDING RESTRICTIONS OR ACQUIESCENCE THEREIN AS A BAR TO ENFORCEMENT. — The deeds of all lots in a tract contained restrictions against building within thirty feet of the street. Many of the owners, including the plaintiffs, built open porches which encroached upon the restricted area, but no objection was ever raised. The defendant commenced to reconstruct his house so that the main part would extend eight feet beyond the building line. The plaintiffs, including the owners of the property adjoining the defendant's lot, seek an injunction. *Held*, that the injunction be granted. *Scott* v. *Stoner*, 69 Pitts. Leg. Jour. 88 (Pa.).

When a tract of land is divided into lots subject to mutual building restrictions, violations by a considerable number of the grantees may make the purpose no longer attainable, and therefore the restrictions will be unenforceable, whether or not the complainant has participated in the violations. *Scharer* v. *Pantler*, 127 Mo. App. 433, 105 S. W. 668; *Ewertsen* v. *Gerstenberg*, 186 Ill. 344, 57 N. E. 1051. But even if the purpose is still attainable, a complainant may be barred by his laches in not objecting seasonably to the defendants' violations. *Roper* v. *Williams*, Turn. & R. 18. *Cf. Bouvier* v. *Segardi*, 112 Misc. 689, 183 N. Y. Supp. 814. Or his participation in the violations may bar any right to injunctive relief. *Loud* v. *Pendergast*, 206 Mass. 122, 92 N. E. 40. See BERRY, RESTRICTIONS ON USE OF REAL PROPERTY, § 397. Mere acquiescence in violations by others is not ground for denying a complainant relief against a subsequent violation. *Brigham* v. *Mulock Co.*, 74 N. J. Eq.